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January 14, 2025

Via ECF

Hon. Nelson S. Roman  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**In light of the extension of the discovery deadline, the Jan. 23, 2025 Status Teleconf. is adjourned *sine die*. Any party seeking leave to file a dispositive motion shall file a pre-motion letter by Feb. 28, 2025. Responses thereto shall be filed by March 5, 2025. Clerk of Court is requested to terminate the motion at ECF No. 82.**

**Dated: White Plains, NY**  
**January 15, 2025**

**SO ORDERED**

HON. NELSON S. ROMÁN  
UNITED STATES DISTRICT JUDGE

**Re:** Bryan Swanhart, et al, v. State of New York, et al – Docket # 20-cv-6819

Dear Judge Roman:

This letter is jointly submitted by counsel for all parties. We are presently scheduled for a conference with your Honor on January 23, 2025 at 1:00 p.m. I will be out of the country at the time of the scheduled conference and am respectfully requesting an adjournment with the consent of defense counsel.

Counsel have been appearing before Magistrate McCarthy and are next scheduled for a conference with the Magistrate on February 20, 2025. Discovery has been completed pending production of documents from third party entities pursuant to releases provided by Plaintiff to defense counsel.

Counsel is therefore jointly requesting an adjournment of our conference before your Honor to a date after February 20, 2025 at which time it is anticipated the parties will each seek to proceed with summary judgment motions. Thank you for your consideration.

Very truly yours,

*by Thomas M. Gambino*

Thomas M. Gambino, Esq.

c: John Jerman, Esq. – via ECF

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